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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA (LAS VEGAS)**

MANUEL L. GARCIA)	
)	Case No.: 2:18-CV-02226-JCM-GWF
Plaintiff,)	
)	UNOPPOSED MOTION FOR EXTENSION
vs.)	OF TIME TO FILE REPLY TO PLAINTIFF'S
)	RESPONSE TO DEFENDANT'S MOTION TO
ANDREW SAUL,)	ALTER OR AMEND JUDGMENT
Commissioner of Social Security,)	PURSUANT TO FEDERAL RULE OF CIVIL
)	PROCEDURE 59(e)
Defendant.)	
)	

IT IS HEREBY STIPULATED, by and between Manuel L. Garcia (Plaintiff) and Andrew Saul, Commissioner of Social Security (Defendant), by and through their respective counsel of record, that Defendant shall have an extension of time of seven (7) days to file his Reply to Plaintiff's Response to Defendant's Motion to Alter or Amend Judgment Pursuant to Federal Rule of Civil Procedure 59(e). The current due date is May 1, 2020. The new due date will be May 8, 2020.

Defendant requests this extension because counsel for Defendant has been ill and on intermittent leave since Plaintiff filed his response to Defendant's motion one week ago, and therefore counsel has

1 not been able to review Plaintiff's response. This request is made in good faith with no intention to
2 unduly delay the proceedings. Counsel for Defendant conferred with Plaintiff's counsel, who has no
3 opposition to this motion, on May 1, 2020. It is therefore respectfully requested that Defendant be
4 granted a seven (7) day extension of time to respond to Plaintiff's motion, up to and including May 8,
5 2020.
6

7 Respectfully submitted,

8 Dated: May 1, 2020

9 By: /s/ Cyrus Safa *
10 CYRUS SAFA
11 Law Offices of Lawrence D. Rohlfing
12 (*by email authorization on 5/1/2020)

13 Dated: May 1, 2020

14 NICHOLAS A. TRUTANICH
15 United States Attorney
16 District of Nevada

17 By: /s/ Gina Tomaselli
18 GINA TOMASELLI
19 Special Assistant United States Attorney

20 Attorneys for Defendant

21 **IT IS SO ORDERED.**

22 **IT IS FURTHER ORDERED that all future filings must include the correct correct**
23 **caption - 2:18-cv-02226-WGC. See ECF No. 27.**

24 

25

UNITED STATES MAGISTRATE JUDGE

26 **DATED: May 4, 2020**
27
28

CERTIFICATE OF SERVICE

I, Gina Tomaselli, certify that the following parties were served with UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE REPLY TO PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO ALTER OR AMEND JUDGMENT PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 59(e) on the date and via the method of service identified below:

Electronic Filing Via CM/ECF:

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Dated: May 1, 2020

/s/ Gina Tomaselli
GINA TOMASELLI
Special Assistant United States Attorney